



March 10, 2015

VIA HAND DELIVERY

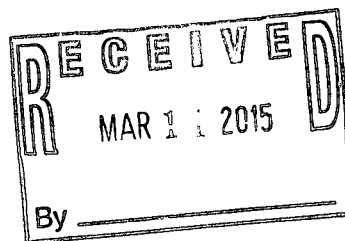
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Michael A. Kunz, Esquire
Clerk of Court - USDC/EDPA
U.S. District Court - Eastern District of PA
James A. Byrne Courthouse
601 Market Street
Philadelphia, PA 19106-1797



Re: **Constand v. Cosby**
Civil Action No.: 05-cv-01099-ER

Dear Mr. Kunz:

Our firm represents William H. Cosby, Jr. in this matter. We received the Court's January 12, 2015 notice of the potential unsealing of certain discovery motions, pursuant to Rule 5.1.5 of the Local Rules of Civil Procedure. Mr. Cosby hereby provides notice that he does object to the unsealing of the documents at issue. Given his objection, we understand that the matter will be determined by the Court, in accordance with the Local Rule 5.1.5. This is a complex matter, involving important and legitimate privacy issues, and is governed by *Leucadia, Inc. v. Applied Extrusion Technologies, Inc.*, 998 F.2d 157 (3d Cir. 1993). Mr. Cosby requests that the Court provide a briefing schedule, so that he and any other interested parties may be heard.

Respectfully,

COZEN O'CONNOR

A handwritten signature in cursive script that reads 'George M. Gowen'.

By: George M. Gowen

GMG/laa

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